

MEMO ENDORSED

CAHILL GORDON & REINDEL LLP
 EIGHTY PINE STREET
 NEW YORK, NY 10005-1702

USDC SDNY
 DOCUMENT
 ELECTRONICALLY FILED
 DOC #:
 DATE FILED: 8/1/2020

HELENE R. BANKS
 ANIRUDH BANSAL
 DAVID L. BARASH
 LANDIS C. BEST
 BRADLEY J. BONDI
 BROCKTON B. BOSSON
 JAMES J. CLARK
 CHRISTOPHER W. CLEMENT
 LISA COLLIER
 AYANO K. CREED
 SEAN M. DAVIS
 STUART G. DOWNING
 ADAM M. DWORKIN
 ANASTASIA EFIMOVA
 JENNIFER B. EZRING
 HELENA S. FRANCESCHI
 JOAN MURTAGH FRANKEL

JONATHAN J. FRANKEL
 ARIEL GOLDMAN
 JASON M. HALL
 WILLIAM M. HARTNETT
 NOLA B. HELLER
 CRAIG M. HOROWITZ
 DOUGLAS S. HOROWITZ
 TIMOTHY B. HOWELL
 DAVID G. JANUSZEWSKI
 ELAI KATZ
 BRIAN S. KELLEHER
 RICHARD KELLY
 CHÉRIE R. KISER*
 JOEL KURTZBERG
 TED B. LACEY
 MARC R. LASHBROOK
 ALIZA R. LEVINE

TELEPHONE: (212) 701-3000
 WWW.CAHILL.COM

1990 K STREET, N.W.
 WASHINGTON, DC 20006-1181
 (202) 862-8900

CAHILL GORDON & REINDEL (UK) LLP
 24 MONUMENT STREET
 LONDON EC3R 8AJ
 +44 (0) 20 7920 9800

WRITER'S DIRECT NUMBER

JOEL H. LEVITIN
 GEOFFREY E. LIEBMANN
 BRIAN T. MARKLEY
 MEGHAN N. McDERMOTT
 WILLIAM J. MILLER
 NOAH B. NEWITZ
 DAVID R. OWEN
 JOHN PAPACHRISTOS
 LUIS R. PENALVER
 KIMBERLY PETILLO-DÉCOSSARD
 SHEILA C. RAMESH
 MICHAEL W. REDDY
 OLEG REZZY
 THORN ROSENTHAL
 TAMMY L. ROY
 JONATHAN A. SCHAFFZIN
 MICHAEL A. SHERMAN

DARRIN S. SLEVER
 JOSIAH M. SLOTNICK
 RICHARD A. STIEGLITZ JR.
 ROSS E. STURMAN
 SUSANNA M. SUH
 ANTHONY K. TAMA
 JONATHAN D. THIER
 SEAN P. TONOLLI
 JOHN A. TRIPODORO
 GLENN J. WALDRIP, JR.
 HERBERT S. WASHER
 MICHAEL B. WEISS
 DAVID WISHENGRAD
 COREY WRIGHT
 JOSHUA M. ZELIG
 DANIEL J. ZUBKOFF

* ADMITTED IN DC ONLY

(212) 701-3207

August 10, 2020

Re: United States v. Michael Del Villar, 20-cr-295 (VEC)

The Honorable Valerie E. Caproni
 United States District Judge
 Southern District of New York
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, NY 10007

Dear Judge Caproni,

I respectfully submit this letter on behalf of the defendant Michael Del Villar, to seek, with consent from the Government and Pretrial Services, a modification to the terms of his pretrial release.

The current conditions of Mr. Del Villar's pretrial release require home detention (with GPS electronic monitoring) except, as approved by Pretrial Services, for the purposes of verifiable employment, medical visits for himself and his immediate family, and attorney visits. Mr. Del Villar currently resides in the Central District of California and has obtained employment as a floor assistant at a furniture store in Los Angeles. Currently, he assists with the merchandise on the premises, but his employer has asked him to make deliveries by truck in the greater Los Angeles area, something currently not permitted by the terms of his release (although the terms require him to maintain employment).

In addition, Mr. Del Villar resides with his girlfriend and two daughters, two and a half years and four months, respectively. Mr. Del Villar's girlfriend needs help procuring necessities for their young family, such as diapers, groceries, and gas for their car, which, under his current terms of release, Mr. Del Villar cannot provide. Accordingly, we respectfully request that the

CAHILL GORDON & REINDEL LLP

-2-

Court modify the terms of Mr. Del Villar's pretrial release from home detention to include a curfew, enforced by GPS electronic monitoring, with the hours to be set by Pretrial Services.

The Government and Pretrial Services in the Southern District of New York and the Central District of California consent to this request.

Application GRANTED.

SO ORDERED.


8/11/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

/s/ Anirudh Bansal

Anirudh Bansal

Counsel for Michael Del Villar

cc: Brett Kalikow, Assistant United States Attorney (via e-mail)
United States Pretrial Services Officer Ashley Cosme (via e-mail)
United States Pretrial Services Officer Tiffany Rivers (via e-mail)
United States Pretrial Services Officer Brenda Mercado (via e-mail)